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**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

November 23, 1998

**Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, DC 20554**

**Re: In the Matter of GTE Corporation, Transferor
And Bell Atlantic Corporation, Transferee, For
Consent to Transfer Control, CC Docket 98-
184**

Dear Ms. Salas:

**Please find enclosed an original and twelve copies of the
above-referenced submission. You may reach me at (202) 408-1403 if
you have any questions. Thank you for your assistance.**

Sincerely,

A handwritten signature in cursive script that reads "Ginger L. Beverly".

**Ginger L. Beverly
Administrative Assistant**

Enclosures

**No. of Copies rec'd
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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
GTE Corporation,)	CC Docket No. 98-184
)	
Transferor)	
And)	
)	
Bell Atlantic Corporation,)	
)	
Transferee,)	
)	
For Consent to Transfer Control)	

COMMENTS OF THE
ALLIANCE FOR PUBLIC TECHNOLOGY

The Alliance for Public Technology (APT)¹, a consumer coalition of over 300 public interest organizations and individuals, submits these comments concerning the transfer of control of GTE Corporation to Bell Atlantic Corporation. The Communications Act of 1934, as amended, requires that the Commission determine whether the requested transfer serves “the public interest, convenience and necessity.”² In conducting its public interest evaluation, APT asks the Commission to consider how the proposed merger of Bell Atlantic and GTE can advance the goals of Section 706 of the 1996 Act to “encourage the deployment on a reasonable and

¹ The Alliance was founded in 1988 as a non-profit, tax-exempt membership organization with the charter to foster affordable access by all consumers to advanced telecommunications services. APT's Board of Directors govern the organization.

timely basis of advanced telecommunications capability to all Americans....”³

The Alliance has urged the Commission in previous proceedings to implement policies that promote infrastructure investment and access to advanced telecommunications services, as the 1996 Act requires.⁴ We believe, as Chairman Kennard recently stated to the National Association of Regulatory Utility Commissioners, that “Universal service is not just a telephone to every home – it is, and it should be, universal access to advanced services from every from every community.”

As approval requests for this transaction and others are being considered, APT counsels the Commission to use its merger approval authority in a manner consistent with its obligations under Section 706. Given the geographic dispersion of Bell Atlantic and GTE’s combined service areas, the strength of GTE’s data networks and the rate at which both companies have deployed high capacity network technologies, this merger has the potential to advance the ubiquity goals of Section 706. APT urges the FCC to ensure that the merged companies use some of the increased investment capacity to deploy infrastructure upgrades in underserved communities.

Any proposed merger requires safeguards to ensure the continued diffusion of technology to marginalized communities and infrastructure investment. We believe that Section 706 of the 1996 Act provides the Commission with the authority and the means to impose such safeguards. In our view, Section 706 firmly supports such

² 47 U.S.C. Sec. 310 (d). See also, 47 U.S.C. Sec. 214 (a).

³ 47 U.S.C. Sec. 157 note.

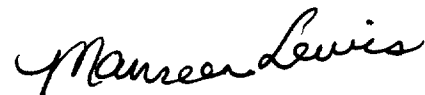
⁴ See, for example, Comments of the Alliance for Public Technology, In the Matter of Federal-State Joint Service Board on Universal Service, CC Docket No. 96-45 (Dec. 19, 1996); and Comments of the Alliance for Public Technology, In the Matter of Implementation of the Local Competition

action, for the provision states that the Commission and its state counterparts, shall encourage the timely deployment of advanced telecommunications capability to all citizens by

utilizing, in a manner consistent with the public interest, convenience, and necessity, price cap regulation, regulatory forbearance, **measures that promote competition in the local telecommunications market, or other regulating methods that remove barriers to infrastructure investment.** (Emphasis added.)

Accordingly, we recommend that the Commission condition any approval to transfer control of telecommunications licenses and properties in this and future transactions, on the requirement of a social compact to ensure that the surviving company will use some portion of the "synergy savings" to deploy advanced telecommunications infrastructure to traditionally underserved areas.

Respectfully submitted,



Maureen Lewis
General Counsel



Donald Vial
Policy Committee Chair

The Alliance for Public
Technology
901 Fifteenth Street, N.W., Suite
230
Washington, DC 20005
(202) 408-1403

CERTIFICATE OF SERVICE

I, Ginger Beverly, a secretary for Alliance for Public Technology, hereby certify that on the 23rd day of November, 1998, copies of the foregoing "In the Matter of GTE Corporation, Transferor And Bell Atlantic Corporation, Transferee, For Consent to Transfer Control", CC Docket 98-184, were hand delivered to:

Ms. Magalie Romas Salas
Commission Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, DC 20554

Ms. Carol Matthey
Chief, Policy and Program Planning Division
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Federal Communications Commission
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Federal Communications Commission
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Ginger L. Beverly